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**ATTN: Patent Application 10/803,507**

United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450  
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Dear Mr. Jeanglaude:

As per our phone conversation earlier today, this letter is to respond to your August 12, 2005 office action on which you rejected Claims 1-23 based on the article "A Linear Time, Constant Space Difference Algorithm" by Burns and Long.

Although the parameters  $M$  and  $N$  in this article denote the sizes of the two files (the source file and target files) as do the parameters  $m$  and  $n$  in my patent, the parameter  $K$  is used differently in this article than in my patent.

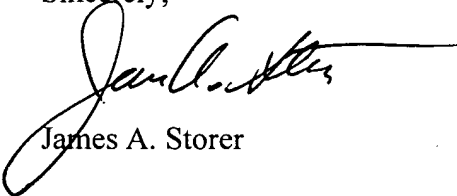
This article teaches one to use  $K$  space in addition to the space for the source and target files, for a total of  $(M+N) + K$  space. That is, the phrase "Constant Space" in the title of this article refers to space *in addition* to  $M+N$ .

In contrast, all independent claims of my patent require that  $T$  can be recovered from  $S$  using at most  $\text{MAX}\{m,n\}+K$  space where  $0 \leq K < \text{MIN}\{m,n\}$ . So even when  $K$  is as large as allowed by my claims ( $K = \text{MIN}\{m,n\}-1$ ), it must be that less than  $m+n$  space is used (since the quantity  $\text{MAX}\{m,n\}+K$  can be at most  $m+n-1$ ). That is, the phrase "In-Place" in the title of my patent refers to the fact that decoding uses space *less* than  $m+n$ .

I hope that this explanation suffices for you to allow my claims, please feel free to call or write me with any further questions.

Thank you.

Sincerely,



James A. Storer